## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

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## MEMORANDUM

DATE: October 9, 1992

SUBJ: Draft PA-Score Evaluation

Burt Company Portland, ME MED985468024 TDD# 9104-20-AWS

FROM: Nancy Smith

ME Site Assessment Manager

THRU: Sharon Hayes

Work Assignment Manager

TO: Jocelyn Boesch

Roy F. Weston, Inc.

I have reviewed the draft PA-Score package and have the following comments:

Page 2, I disagree with the rationale for not suspecting a release to groundwater. Some of the compounds detected in onsite soils and sediments are liquids and must have been disposed of (released) as liquids. Therefore, they would have a high probability of migrating to groundwater. Fire-fighting activities which occurred onsite may have exacerbated the migration of wastes. Considering the proximity of the wetland to source areas, groundwater is probably relatively shallow. Please re-score this section, including a suspected release to groundwater, and provide appropriate rationale and reference citations for suspecting a release.

Page 3, Include a rationale and reference citations for why you do not suspect primary groundwater targets.

Page 7, A crucial question for this site is, "Is there really a surface water pathway?" Refer to my comments for the draft SI report.

Page 9, Include a rationale and reference citations for why you do not suspect a primary fishery.

Page 19, Include a rationale and reference citations for why you do not suspect a release to air.

Please revise the PA-Score evaluation to address these comments.